

KELLER & BENVENUTTI LLP
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
Thomas B. Rupp (#278041)
(trupp@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

JADOOTV, INC.,

Debtor.

Case No. 19-41283 (WJL)
Chapter 11

Adv. Pro. No. 19-04042 (WJL)

JADOOTV INC.;
CLOUDSTREAM MEDIA, INC.,

Plaintiffs,

v.

DISH NETWORK L.L.C.

Defendant.

**JOINT STATEMENT OF DEBTORS AND DISH
NETWORK L.L.C. REGARDING JANUARY 8,
2020 STATUS CONFERENCE AND NOTICE
OF PROPOSED ORDER WITH RESPECT TO
RELIEF FROM STAY MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

Date: January 8, 2020

Time: 10:30 a.m.

Place: United States Bankruptcy Court
Courtroom 220
1300 Clay Street
Oakland, CA 94612

JadooTV, Inc. (“JadooTV” of the “Debtor”), as debtor and debtor in possession in the above-captioned chapter 11 case (the “Chapter 11 Case”), and DISH Network L.L.C. (“DISH”) hereby submit this Joint Statement in connection with the continued status conference in the Chapter 11 Cases to be held on January 8, 2020, at 10:30 a.m. (Pacific time):

1. On August 19, 2019, DISH filed *DISH Network L.L.C.’s Motion for Relief from Stay Pursuant to 11 U.S.C. § 362(d) and Memorandum of Points and Authorities* [Dkt. No. 102] (the “Relief from Stay Motion”), seeking that the Court lift the automatic stay and permit DISH to prosecute the Copyright Action (as defined therein) against JadooTV.

2. On August 30, 2019, the Debtors filed (a) an opposition to the Relief from Stay Motion, and (b) a *Motion for a Preliminary Injunction and Temporary Restraining Order as to DISH Network L.L.C. v. JadooTV, Inc., et al., 2:18-CV-09768-FMO-KS (C.D. Cal.) and Memorandum of Points and Authorities in Support* [Dkt. No. 2, Adv. Pro. No. 19-04042] (the “Motion for Preliminary Injunction”). By the Motion for Preliminary Injunction, the Debtors sought that the Court enjoin further prosecution of the Copyright Action against Sajid Sohail (“Sohail”), with the same effect and to the same extent as would be the case if section 362(a) of the Bankruptcy Code applied.

3. The Court held hearings on the Relief from Stay Motion and the Motion for Preliminary Injunction on September 4, September 16, 2019, and October 2, 2019.

4. On October 3, 2019, the Court entered the *Order with Respect to Relief from Stay Motion and Motion for Preliminary Injunction* [Dkt. No. 168], which, among other things, stayed the Copyright Action as against JadooTV and enforced a standstill of the Copyright Action as against Sohail, conditioned upon JadooTV filing a plan of reorganization by no later than December 31, 2019, unless such deadline is modified by further Court order.

5. JadooTV did not file a plan of reorganization by December 31, 2019. Accordingly, JadooTV and DISH have agreed that the automatic stay with respect to the Copyright Action will be lifted and that DISH may prosecute the Copyright Action against both JadooTV and Sohail, effective as of January 14, 2020, to allow DISH to liquidate its claims in the Copyright Action.

6. JadooTV will also dismiss the above-captioned adversary proceeding.

